

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

BRYNNE SOUKUP,)
Plaintiff,)
v.) Civil Action No. 1:20-cv-648-RP
FRONTIER AIRLINES, INC. and)
FLIGHT SERVICES & SYSTEMS, LLC,)
Defendants.)

JOINT MOTION TO CONTINUE THE PARTIES' EXPERT REPORT DEADLINES

NOW INTO COURT, come Plaintiff, Brynne Soukup (“Plaintiff”), and Defendant, Flight Services & Systems, LLC (“Defendant” or “FSS”), who file this Joint Motion to Continue the Parties’ Expert Report Deadlines in the above-captioned matter and respectfully request a 60-day extension for each party to serve their expert reports – for the reasons more fully explained herein.

1. On July 21, 2020, Plaintiff filed an amended complaint alleging workplace discrimination, harassment, and retaliation against co-defendants, FSS and Frontier Airlines, Inc. *See* Amended Complaint, Rec. Doc. 7.
2. In response, Frontier Airlines, Inc. filed a Motion to Dismiss, Rec. Doc. 10, on August 4, 2020, and FSS filed its own Motion to Dismiss, Rec. Doc. 19, on October 7, 2020.
3. While FSS’s and Frontier Airlines, Inc.’s Motions to Dismiss were pending, the Parties agreed to delay significant discovery until the motions were ruled upon – so that the Parties could focus their discovery efforts on the surviving claims and/or parties.
4. On February 9, 2021, this Court granted Frontier Airlines, Inc.’s Motion to Dismiss in whole and granted FSS’s Motion to Dismiss in part, dismissing Plaintiff’s harassment claims against FSS. *See* Order, Rec. Doc. 33.

5. Since then, Plaintiff and FSS have conducted and continue to conduct discovery.
6. Under the Scheduling Order, Plaintiff's deadline to serve expert reports is March 12, 2021, and FSS's deadline to serve expert reports is April 12, 2021. *See* Rec. Doc. 28.
7. Plaintiff and FSS respectfully request that both Parties' deadlines to serve expert reports be extended 60-days in order to provide the Parties with additional time to conduct discovery on Plaintiff's surviving claims.
8. Specifically, Plaintiff respectfully requests a 60-day extension, or until May 11, 2021, to serve her expert reports, and FSS respectfully requests a 60-day extension, or until June 11, 2021, to serve its expert reports.
9. The discovery deadline in this case is August 20, 2021, and this case is currently set for a jury trial beginning December 13, 2021.
10. The requested 60-day extension of the Parties' respective expert report deadlines will not affect the trial date or other pre-trial deadlines.
11. Plaintiff and FSS respectfully represent that they are not seeking this extension for any improper purpose and that this is the first request for an extension of any pre-trial deadline by either party.

WHEREFORE, Plaintiff, Brynne Soukup, and Defendant, Flight Services & Systems, LLC, respectfully request that the Court grant this Joint Motion to Continue the Parties' Expert Report Deadlines in the above-captioned matter, extending Plaintiff's deadline to serve expert reports until May 11, 2021, and extending FSS's deadline to serve expert reports until June 11, 2021.

Respectfully Submitted:

/s/ Trenton Lacy

Daniel B. Ross
State Bar No. 00789810
Trenton Lacy
State Bar No. 24106176
ROSS • SCALISE LAW GROUP
1104 San Antonio Street
Austin, Texas 78701
Telephone: (512) 474-7677
Facsimile: (512) 474-5306
dan@rosslawgroup.com
trenton@rosslawgroup.com

-and-

CHAFFE McCALL, LLP

/s/ Sarah V. Myers

Sarah Voorhies Myers (pro hac vice)
Amy L. McIntire (pro hac vice)
2300 Energy Centre, 1100 Poydras Street
New Orleans, LA 70163
T: (504) 585-7000
F: (504) 544-6092
E: myers@chaffe.com
E: mcintire@chaffe.com

H. Michael Bush
Texas Bar No. 24054296
2300 Energy Centre, 1100 Poydras Street
New Orleans, LA 70163
T: (504) 585-7000
F: (504) 544-6042
E: bush@chaffe.com
*Attorneys for Defendant,
Flight Services & Systems, LLC*